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DRF No. 360849
Implementing document: MCP-3480

ENVIRONMENTAL CHECKLIST IDAHO NATIONAL LABORATORY SITE APPROVED COPY

EC Document No.: ICP-20-003

DIRECTIONS: Responsible Managers, Project Environmental Lead, and Environmental Compliance personnel complete this form by following the instructions in MCP-3480, Section 4.1.

SECTION A. Descriptive Information: Provide additional project or contact information on an attached sheet.

Charge Number: 2311CL

Project Title: RWMC/AMWTP - WMF-636 Interim Status Document Units HWMA/RCRA Closure

DOE HQ Program: EM

Performing Organization: AMWTP Operations Date: March 17, 2020

Contact	Name	Telephone No.	E-mail Address
DOE Project Technical Manager:	<u>Alicia Wichmann</u>	<u>208-390-1309</u>	<u>wichmaa@id.doe.gov</u>
Facility Operations/Tenant Manager:	<u>Ross Langseth</u>	<u>208-533-0135</u>	<u>ross.langseth@icp.doe.gov</u>
Program/Project Manager:	<u>Bryan Breffle</u>	<u>208-533-0683</u>	<u>bryan.breffle@icp.doe.gov</u>
Project/Technical Contact:	<u>Mark Henderson</u>	<u>208-533-0365</u>	<u>mark.henderson@icp.doe.gov</u>
Alternative Project/Technical Contact:			
Project Environmental Lead Contact:	<u>Kendall Coughlan</u>	<u>208-533-6354</u>	<u>kendall.coughlan@icp.doe.gov</u>

SECTION B. Project Description: Provide a brief and accurate description of the project or activity on attached sheet.

SECTION C. Environmental Aspects / Potential Sources of Impact: Check the appropriate box and provide explanation for any aspect checked 'Yes' on an attached sheet.

Source	Yes	No	Source	Yes	No
1. Air Pollutants	<input checked="" type="checkbox"/>	<input type="checkbox"/>	10. Material or Waste Packaging and Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Asbestos Emissions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	11. Interaction with Wildlife/Habitat	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Radionuclide Release/Protection of the Public and the Environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	12. Managing Property and Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Chemical Use and Storage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	13. PCB Contamination	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Contaminated Sites Disturbance	<input checked="" type="checkbox"/>	<input type="checkbox"/>	14. Radioactive Materials Use and Storage	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Cultural/Historical Resource Disturbance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	15. Storage of Regulated Hazardous/Rad. Materials or Waste in Tanks	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Discharge to Wastewater Systems or Groundwater	<input type="checkbox"/>	<input checked="" type="checkbox"/>	16. Use, Reuse and Recycling of Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Drinking Water Contamination	<input type="checkbox"/>	<input checked="" type="checkbox"/>	17. Work within areas Subject to Flooding	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Waste Generation and Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	18. Vehicle Fleet Management/Use	<input type="checkbox"/>	<input checked="" type="checkbox"/>

SECTION D. Work Activities and Environmental Checklist Submittal Determination: Select all of the applicable work activities listed on page 2 of this form. Identify work activity numbers and work activity titles (from page 2) on attached sheet. Determine whether to submit the environmental checklist to Environmental Programs for review and approval and check one of the following:

- Required to submit the EC to Environmental Programs.
- Not required to submit EC.

SECTION E. Conditions: (If Yes, see attachment for instructions.) Yes No

Are conditions required before starting project? If yes, provide a description of the condition on the attached sheet.

SECTION F. Determine the Level of Environmental Review (or Documentation) and Reference(s): such as categorical exclusion number, Environmental Assessment or Environmental Impact Statement Document Number, CERCLA Record of Decision, or Environmental Checklist Number. Provide justification for selecting the level of review on an attached sheet.

- CX EA EIS CERCLA Previously approved NEPA document Routine maintenance or operational activities

Reference(s): National Environmental Policy Act Implementing Procedures, Categorical Exclusion B6.1, Cleanup Actions

Note: For projects checked above as "CX" (Categorical Exclusion) the proposed action must not: 1) threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, including requirements of DOE orders; 2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities; 3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; 4) adversely affect environmentally sensitive resources. In addition, no extraordinary circumstances related to the proposal exist which would affect the significance of the action, and the action is not "connected" or "related" (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts. Note: The above paragraph does not apply to EA, EIS, or CERCLA related activities.

SIGNATURE BLOCK. Signature indicates that this form is accurate and complete

Wendy Savkranz

Print/Type Name	Signature	Date
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Performing Project Scoping Activities & Siting Studies			Operating Facilities, Equipment or Processes (Cont.)			Discont. Use Of, or Closing Facil., Equip. or Proc. (Cont.)		
<input type="checkbox"/>	Performing Siting Studies for New Buildings or Structures	4.7	<input checked="" type="checkbox"/>	Using, Storing & Dispositioning Chemicals	4.4	<input type="checkbox"/>	Temp. Discontinuing Use of, or Temporarily Relocating or Removing reg. UST reg. under 40 CFR 280	4.19
Constructing or Modifying Facilities, Equip. or Processes			<input type="checkbox"/>	Using Drinking Water Systems & Controlling X-Connections at the Site	4.13			
<input type="checkbox"/>	Constructing/Modifying Facilities, Structures, Equipment, or Processes (including changes to operating conditions) - General	4.7	<input type="checkbox"/>	Managing Elemental Lead	4.23	<input type="checkbox"/>	Abandoning or Closing Septic Tanks or Syst.	4.16
<input checked="" type="checkbox"/>	Constructing/Modifying Stationary Air Emission Sources	4.9	<input checked="" type="checkbox"/>	Performing Activities with the Potential for Fugitive Dust or Fugitive Emissions	4.9	<input type="checkbox"/>	Abandoning Potable Water, Prod. Monit., & Observation Wells	4.14
<input type="checkbox"/>	Relocating Portable Air Emission Sources, or Bringing Portable or Stationary Air Emission Sources onto the INL Site	4.9	<input type="checkbox"/>	Conducting Open Burning	4.9	<input type="checkbox"/>	Abandoning Injection Wells	4.15
<input type="checkbox"/>	Constructing/Modifying Drinking Water Syst. & Controlling X-Connections at the Site	4.13	<input type="checkbox"/>	Responding to Regulatory Inspections	4.2	Site Remediation Activation		
<input type="checkbox"/>	Constructing/Modifying Facilities that Store Oil in Containers or Tanks	4.18	<input type="checkbox"/>	Performing Routine Administrative Activities	4.1	<input type="checkbox"/>	Performing Site Remediation Activation	4.8
<input type="checkbox"/>	Constructing/Modifying AST or UST <u>not</u> Regulated under 40 CFR 280	4.20	<input type="checkbox"/>	Conducting training exercises and simulations related to protective force & emergency response training, fire fighter & rescue training, and spill cleanup training on the INL Site (includes, but <u>not</u> limited to indoor and outdoor training at firing ranges and elsewhere on site)	INL Scope	Disturbing Soils		
<input type="checkbox"/>	Constructing/Modifying UST Systems Regulated under 40 CFR 280	4.19				<input checked="" type="checkbox"/>	Disturbing Soils	4.7
<input type="checkbox"/>	Changing Use or Reactivating UST Regulated under 40 CFR 280	4.19	Maintaining or Repairing Facilities, Equip., or Processes			Purchasing Goods or Services		
<input type="checkbox"/>	Const./Mod. Facilities, Equip. or Processes at Permitted or Interim Status RCRA Facilities	4.7	<input type="checkbox"/>	Maint./Repair. Facilities, Structures, Equipment or Processes – General	4.7	<input type="checkbox"/>	Transacting Real Property	4.3
<input type="checkbox"/>	Const./Mod. Septic Tanks or Systems	4.17	<input type="checkbox"/>	Making Mods. to Facilities, Bldgs, Structures, or Equip. as part of Routine Maintenance	4.7	<input checked="" type="checkbox"/>	Purchasing Goods or Services	4.3
<input type="checkbox"/>	Const./Mod. Sewage & Other Wastewater Systems	4.16	<input type="checkbox"/>	Starting Up, Shutting Down, or Perf. Sched. Maint. on Stationary Air Emissions Sources	4.9	<input type="checkbox"/>	Purchasing Diesel Fuel	4.3
<input type="checkbox"/>	Discharging New Wastewaters at the INL Site	4.16	<input type="checkbox"/>	Repair. AST/UST <u>not</u> reg. under 40 CFR 280	4.20	<input type="checkbox"/>	Procuring Pesticides	4.3
<input type="checkbox"/>	Const./Mod. Potable Water, Production, Monitoring, & Observation Wells	4.14	<input type="checkbox"/>	Repair. UST reg. under 40 CFR 280	4.19	<input type="checkbox"/>	Procuring Refrig., Appl. Containing Refrig., Syst. Components that Operate Using Refrig., or Refrig. Recovery or Recycling Equipment	4.3
<input type="checkbox"/>	Const./Mod. Injection Wells	4.15	<input type="checkbox"/>	Maint./Repair. or Altering Drinking Water Systems at the Site	4.13	<input checked="" type="checkbox"/>	Procuring Off-Site Waste Management & Recycling Services	4.3
<input type="checkbox"/>	Conducting New or Modifying Research & Development (R&D) Activities, Including Indoor Bench-Scale & Small-Scale R&D Activities, & Small-Scale Pilot Projects	4.1	<input checked="" type="checkbox"/>	Maint. Equip. Containing, or Contaminated with PCBs	4.21	Spills/Releases/Fires/Explosions; & Permit or Reg. Exceed.		
<input type="checkbox"/>	Reactivating Buildings or Facilities from Standby (Inactive) Status	4.7	<input type="checkbox"/>	Decontaminating Equip. Containing or Contaminated with PCBs	4.21	<input checked="" type="checkbox"/>	Reporting & Cleaning Up Spills & Releases	4.2
			<input type="checkbox"/>	Maint./Repair. Motor Vehicle Gasoline Station Pumps	4.18	<input type="checkbox"/>	Exceeding Permitted or Regulatory Limits- Drinking Water	4.13
			<input type="checkbox"/>	Applying & Storing Pesticides	4.5	<input checked="" type="checkbox"/>	Cleaning Up Spills & Releases of PCBs	4.21
			<input type="checkbox"/>	Applying Fertilizers	4.5	<input type="checkbox"/>	Exceeding Permitted or Regulatory Limits from Stationary Air Emissions Sources	4.9
Operating Facilities, Equipment or Processes			<input type="checkbox"/>	Maint./Repair. Septic Tanks or Septic Syst.	4.17	<input type="checkbox"/>	Releases, Leaks, Spills or Unusual Operating Conditions from USTs reg. under 40 CFR 280	4.19
<input checked="" type="checkbox"/>	Operating Fac., Equip., or Processes - General	4.7	<input type="checkbox"/>	Pumping Septic Tanks or Septic Syst.	4.17	Generating Waste		
<input type="checkbox"/>	Operating & Sampling Drinking Water Systems & Controlling X-Connections at the Site	4.13	<input type="checkbox"/>	Planning Activities that may Break Up, Dislodge, Disturb or Block Access to ACM and Conducting Demolitions	4.12	<input checked="" type="checkbox"/>	Generating Waste	4.22
<input checked="" type="checkbox"/>	Operating Stationary Air Emission Sources	4.9	<input type="checkbox"/>	Removing Asbestos-Containing Material or Conducting a Demolition Activity	4.12	Receiving Off-site Waste, Disposal of Waste & Recycling or Reusing Material		
<input type="checkbox"/>	Operating Stationary, Portable or Mobile Oil Tanks & Oil Container Storage Facilities	4.18	<input type="checkbox"/>	Removing Brake Pads	4.12	<input type="checkbox"/>	Distributing, Excessing or Disposing of Appliances Containing Refrigerant	4.11
<input type="checkbox"/>	Operating AST or UST <u>not</u> reg. under 40 CFR 280	4.20	<input type="checkbox"/>	Maintaining, Testing or Disposing of Halon-Containing Equipment & Halon	4.11	<input checked="" type="checkbox"/>	Dispositioning Excess Materials	4.22
<input type="checkbox"/>	Operating UST reg. under 40 CFR 280	4.19	<input type="checkbox"/>	Maint., Servicing, or Repairing Stationary HVACR Equipment	4.11	<input type="checkbox"/>	Disposing of Asbestos-Containing Material	4.12
<input type="checkbox"/>	Operating Wastewater Syst., including Wastewater Reuse Permit	4.16	<input type="checkbox"/>	Removing Lead from Service, from a Struct., or Classifying Newly Discovered Lead	4.23	<input type="checkbox"/>	Shipping Product Lead Off-site for Direct Reuse at Another Facility	4.23
<input type="checkbox"/>	Operating, Discharging to & Monitoring Permitted Injection Wells	4.15	Discont. Use Of, or Closing Facil., Equip. or Processes			<input type="checkbox"/>	Receiving Off-site Waste Containing One or More of the Hazardous Air Pollutants	4.10
<input type="checkbox"/>	Operating & Discharging to Shallow Injection Wells <u>not</u> Requiring Permit	4.15	<input type="checkbox"/>	DD&D or Closing Facilities (Including Trailers), Structures, Equipment, or Processes - General	4.7	Sample Collection & Management		
<input type="checkbox"/>	Discharging to Septic Tanks or Systems	4.17	<input type="checkbox"/>	Prep. Bldg. or Facil. being Trans. to Surplus or Placed into Standby (Inactive) Status	4.7	<input checked="" type="checkbox"/>	Obtaining Lab. Services for EM-Funded Activities	4.6
<input type="checkbox"/>	Discharging Wastewaters at the INL Site	4.16	<input type="checkbox"/>	Discont. Use of, or Closing Facilities, Equipment or Processes at RCRA Interim Status or Permitted Facilities	4.7	<input checked="" type="checkbox"/>	Preparing to Collect & Collecting CERCLA or DD&D Samples	4.6
<input type="checkbox"/>	Operating Potable Water, Production, Monitoring, & Observation Wells	4.14	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	Packaging & Temporarily Storing Samples	4.6
			<input type="checkbox"/>			<input checked="" type="checkbox"/>	Transferring Samples to a Laboratory	4.6
			<input type="checkbox"/>			<input type="checkbox"/>	Preparing to Collect & Collecting Samples (Non-CERCLA or Non-DD&D)	4.6
			<input type="checkbox"/>			<input checked="" type="checkbox"/>	Storing & Maintaining Samples	4.6
			<input type="checkbox"/>			<input checked="" type="checkbox"/>	Disposing of Samples	4.6
			<input type="checkbox"/>			<input type="checkbox"/>	Reporting Environmental Characterization Data Collected to Support FFA/CO Activities	4.6
			<input type="checkbox"/>			Preservation and Protection of Wildlife and Habitat		
			<input type="checkbox"/>			<input type="checkbox"/>	Preservation and Protection of Wildlife	4.27
			<input type="checkbox"/>			<input type="checkbox"/>	Preservation and Protection of Sagebrush Steppe Ecosystem Reserve	4.28
			<input type="checkbox"/>			Environmental Radiological Protection		
			<input type="checkbox"/>	Discont. Use of, Closing, Relocating, or Removing AST or UST <u>not</u> reg. under 40 CFR 280	4.20	<input checked="" type="checkbox"/>	Environmental Radiological Protection	4.26

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Environmental Checklist Attachments

Section A. Project Description Information: Provide any additional contact information.

Sue Evans, RCRA Closure Project Environmental Lead, 208-533-0086, susan.evans@icp.doe.gov
Environmental Compliance Contact - Justin Carroll (208) 533-0807, justin.carroll@icp.doe.gov

Section B. Project Description: Provide a brief and accurate description of the project or action, including the type of action (for example, new activity or facility, construction, process or facility modification, maintenance, research and development, work for others), description of activities, work phases, location of work activity (for example, facility, building, room, laboratory, emission points, purpose and need (what is the activity and why is it being performed), projected start and end dates and the approximate project costs.

The proposed project will complete Hazardous Waste Management Act (HWMA)/Resource Conservation and Recovery Act (RCRA) closure as detailed in the *AMWTP HWMA/RCRA TSA Interim Status Document Closure Plan* (March 12, 2020). The RCRA closure includes the Retrieval Contamination Enclosure (RCE) on TSA-1 (Pad 1), the balance of TSA-1 (Pad 1), and TSA-R (Pad-R) all of which are in WMF-636 (Technical Support Area – Retrieval Enclosure [TSA-RE]). TSA-2 (Pad 2) also located in WMF-636, is not addressed in this Environmental Checklist. WMF-636 is located at the Radioactive Waste Management Complex (RWMC)/Advanced Mixed Waste Treatment Project (AMWTP).

The TSA-RE was used to manage mixed waste and WMF-636 Pads 1 and R (TSA-1 and TSA-R in the Interim Status Document) are regulated as HWMA/RCRA Interim Status units requiring closure in compliance with 40 CFR 265, “Interim status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities.”

The RCRA Closure actions will be performed within the shell of the TSA-RE building over Pad 1 and Pad R. The utilities, walls, roof structure, ceiling, and the RCE structure located on Pad 1 will remain and are not part of this RCRA Closure. Actions necessary to meet RCRA Closure Performance Standards are:

- ✓ Remove inner contamination enclosure (ICE)-2 and ICE-3,
- ✓ Remove contamination control enclosure (CCE).
- ✓ Remove all asphalt pad material on Pad R and Pad 1 including the RCE and the G-floor mats, herculite and other coverings, and plywood confinement on Pad R.
- ✓ Conduct inspections of concrete in the RCE airlocks for waste-related staining and decontaminate or remove concrete in the RCE airlocks depending on inspection findings. *
- ✓ Conduct inspections of building side walls and RCE walls and decontaminate or remove depending on inspection findings.
- ✓ Remove and dispose of the portable HEPA unit for the ICE units, including ductwork, and filters.
- ✓ Remove and dispose of the ductwork up to the 1st stage HEPA filters, pre-filters, 1st stage HEPA filters, and 1st stage filter housing in the RCE.
- ✓ Review documentation and sample data for the fire water tanks A, B, C, and D to ensure no mixed waste contamination of the fire water collection tanks has occurred. If the tanks are contaminated, they will be grouted in place. To date, historical sampling has shown the tanks and the associated subgrade ancillary systems are not contaminated.

*If decontamination is not successful, then that part of the structure will require removal. Successfully decontaminated areas of structures will remain in place to be removed with the rest of the building during the D&D action.

RCRA closure activities will be integrated with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) non-time critical removal actions to the extent practicable while ensuring protection of human health and the environment. All permitted AMWTP facilities have been added to the scope of the *Action Memorandum of General Decommissioning Activities*, DOE/ID-11293 Rev. 3 (CCN 324012) to initiate and help facilitate this integration.

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Section C. Environmental Aspects: For each item checked 'Yes', provide specific information such as types and amounts of chemicals, waste, effluent, or emissions; size of modification, soil disturbance; or type of tank, equipment, or process and pollution prevention measures for each item checked. Refer to LST-96, "Environmental Aspects of ICP Work Activities," Appendix A to determine if the environmental aspect is applicable to the proposed activity.

1. Air Pollutants - The proposed RCRA Closure project constitutes a cessation of past waste treatment processes, however the operation of all currently required air emissions monitoring equipment will remain on-going during the conduct of the closure activities leading up to the removal and blocking off of ventilation ducts at the first stage of all HEPA filtration systems. Radionuclide emissions from both RCE/ICE within Pad 1 and CCE within Pad R are continuously monitored in accordance with 40 CFR 61.93.(c) and Section 3.18 of the INL Sitewide Permit to Construct and Facility Emission Cap (P-2015.0023). All elements for full compliance with the current Sitewide Permit to Construct requirements governing emissions from the TSA-RE, along with all associated routine testing, calibration, maintenance, and reporting systems will also remain on-going during the RCRA Closure activities to be conducted within the scope of this proposal.

Radionuclide Emissions – Radiological emissions to the environment, including those from point sources associated with the conduct of the proposed RCRA Closure activities within the scope outlined above, will be continuously monitored and annual emissions determined for demonstrating compliance with the NESHAP Standard [see 40 CFR 61.93(a)] and submitted for reporting in the INL NESHAP Annual Report per 40 CFR 61.94. Because the Containment Enclosure exhausts all air emissions through two separate HEPA-filtered ducts, no fugitive emissions will be released. For additional information, contact Walker Howell at 208-533-3323.

3. Radionuclide Release/Protection of the Public and the Environment – The RCRA Closure actions could release radionuclides to the environment however, the potential is very low. Releases would not exceed as low as reasonably achievable goals as the releases are far below applicable regulatory standards (e.g., NESHAPS) and satisfy the exemption criteria included in MCP-3480 Section 4.26. Controls are addressed under aspect 1. Air Pollutants.

4. Chemical Use and Storage - Commercial chemical products will be used as contamination fixatives, to absorb or neutralize spills, decontaminate equipment, tools, etc. and for enabling proper operation of equipment. Project personnel will use non-hazardous product alternatives or substitutes in place of hazardous chemical products as long as the non-hazardous alternative meets the performance requirement or specifications of the requester. Spill prevention/minimization measures will be applied to all aspects of storage and utilization of chemicals/fuels. Affirmative Procurement practices as prescribed in MCP-4021, *Acquisition of Materials and Services*, will be used in procuring chemicals and other materials as applicable.

5. Contaminated Sites Disturbance - The asphalt pads and other floor surface components will be removed. Historically, due to the nature of the earthen covered storage, there have been spills or container breaches that went undetected for some time and were discovered only upon removing the earthen cover and reaching the breached or spilled container. Spills to the asphalt have typically led to the application of radiologically protective fixatives to prevent further spreading of the contamination. The TSA-RE operational record as well as readily visible areas covered in the radiological fixative materials provides for reasonable knowledge of the locations within the asphalt pad areas that will require additional characterization beyond the Idaho CERCLA Disposal Facility (ICDF) baseline characterization surveying being conducted during the pre-removal period.

All applicable Radiological Control and Industrial Safety/Industrial Hygiene procedures will be fully applied to any and all activities involving disturbances to these contaminated areas within the Interim Status Unit.

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9. Waste Generation and Management - A hazardous waste determination will be performed for all secondary waste streams to identify the appropriate management practices. Waste streams will be evaluated to determine if any of these materials can be recycled or reused and will be evaluated to implement actions for minimizing waste generation.

All waste will be managed in compliance with PLN-6011, *Waste Management Plan for WMF-636 TSA-RE* (March 9, 2020).

All waste, other than the primary waste that was in the boxes and drums, should be managed and disposed as CERCLA waste. Engineering Design File-11247 (*WMF-636 RCRA Interim Status Closure Regulated Waste*, March 5, 2020) identifies wastes that must be managed as RCRA closure-generated waste not only for this purpose, but also for the purpose of tracking the waste to support documenting the successful completion of RCRA closure by the professional engineer. RCRA closure generated waste that meets LDR treatment standards should be sent to the ICDF for disposal. Any RCRA closure waste that doesn't meet LDR treatment standards must be sent to an off-site facility that we can verify that EPA will issue a Verification of CERCLA Authority (VCA).

Industrial waste will be generated from tooling actions and equipment setup actions and will be managed through Waste Generator Services and will be disposed of at the INL Landfill Complex. Low-level waste is anticipated to be disposed at the ICDF. Non-radioactive waste is anticipated to be disposed at the INTEC CERCLA demolition waste landfill (ICDWL) or other CERCLA approved disposal facility. RCRA-closure waste (mixed waste) that doesn't (or can't be made to) meet Land Disposal Restrictions treatment standards, exceeds 10 nCi/g (as generated), or exceeds other criteria of the ICDF WAC will be sent to a permitted unit for appropriate management.

Most PCB-contaminated closure wastes should qualify as PCB remediation waste that will be sent to the ICDF for disposal.

10. Material or Waste Handling and Transportation - All waste handling and or transportation will be coordinated with WGS and the RWMC/AMWTP and RWMC/ARP transportation personnel in full accordance with all RWMC/ AMWTP and RWMC/ARP transportation plans and procedures as applicable.

Although not anticipated, there is a potential for spills when using chemicals or fueling equipment. In the event of a spill, notify facility Environmental Staff. If the Environmental Staff cannot be contacted, report the release to the ICP Core Spill Notification Team (208-351-6663).

All applicable waste will be diverted from disposal in the landfill where conditions allow. Project personnel will use every opportunity to recycle, reuse and recover materials and divert waste from the landfill when possible. The project will practice sustainable acquisition, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, are bio-based in content, environmentally preferable, non-ozone depleting, have recycle content or are non-toxic or less toxic alternatives.

13. PCB Contamination - Based on acceptable knowledge, process knowledge, and other documented characterization data and information, RWMC/AMWTP retrieved waste potentially contains waste contaminated with or containing PCBs. If suspect PCB contaminated or containing waste is discovered during the proposed RCRA closure, the applicability of the TSCA/PCB regulation needs to be determined by the ICP TSCA/PCB Technical Resource (TR) with additional information about this waste stream, and should be consistent with management of the PCB component at the AMWTP. Contact RWMC Environmental Field Support staff and/or the TSCA/PCB TR for further guidance (Shawn Rosenberger at 208-533-0027). If suspect PCB liquid is spilled, refer to MCP-3480 section 4.21.2- 8 for appropriate spill clean-up/response and seek further guidance on proper sampling and disposal from RWMC Environmental Field Support staff with assistance from the TSCA/PCB TR and WGS.

PCB waste will be managed as described in Aspect #9 above.

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Section D. Work Activities: Select appropriate environmental instructions by identifying the applicable work activities from page 2 of this form. Identify work activity numbers and titles from page 2 of this form. Include any facility or project-specific environmental instructions not found in MCP-3480.

- 4.2 Reporting and Cleaning Up Spills and Releases
- 4.3 Purchasing Goods and Services
- 4.3 Procuring Off-Site Waste Management & Recycling Services
- 4.4 Using, Storing & Dispositioning Chemicals
- 4.6 Obtaining Lab. Services for EM-Funded Activities
- 4.6 Packaging and Temporarily Storing Samples
- 4.6 Transferring Samples to a Laboratory
- 4.6 Preparing to Collect and Collecting CERCLA or DD&D Samples
- 4.6 Preparing to Collect and Collecting Samples (Non-CERCLA or Non-DD&D)
- 4.6 Storing and Maintaining Samples
- 4.6 Disposing of Samples
- 4.7 Operating Facilities, Equipment, or Processes – General
- 4.7 Discontinue Use of, or Closing Facilities, Equipment or Processes at RCRA Interim Status or Permitted Facilities
- 4.7 Disturbing Soils
- 4.9 Constructing/Modifying Stationary Air Emission Sources
- 4.9 Operating Stationary Air Emission Sources
- 4.9 Operating Stationary Air Emission Sources that Emit Radionuclides
- 4.9 Performing Activities with the Potential for Fugitive Dust or Fugitive Emissions
- 4.21 Maintaining Equipment Containing or Contaminated with PCBs
- 4.21 Decontaminating Equipment Containing or Contaminated with PCBs
- 4.21 Cleaning Up Spills & Releases of PCBs
- 4.22 Generating Waste
- 4.22 Dispositioning Excess Materials
- 4.26 Environmental Radiological Protection

Project Specific Environmental Instructions:

- MCP-1390, *Waste Generator Services*
- MCP-4021, *Acquisition of Materials and Services*
- PLN-6011, *Waste Management Plan for WMF-636 TSA-RE, Rev. 0, March 9, 2020*
- EDF-11247, *WMF-636 RCRA Interim Status Closure Regulated Waste, March 5, 2020*

Section E. Conditions: Identify any conditions (such as permits or clearances) required before the project can begin. Are any of the documents listed below affected by the proposed project or change? If yes, mark the applicable box and provide document number and the section provided.

HWMA/RCRA Permit	Wastewater Permit	Air Permit	RBDA/PCB	Drawing	Other
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

For a drawing to be affected, it must be listed in the HWMA/RCRA Permit or HWMA/RCRA TSA Interim Status document.

NOTE: The AMWTP TSA Interim Status Document required an amendment to revise the closure plan (Section I). The amendment was approved by DEQ on March 12, 2020.

Section F. Level of Environmental Review (or Documentation) and Reference(s): Provide justification and reference for level of environmental review.

The AMWTP construction and operation are addressed and the environmental impacts are bounded in *the Advanced Mixed Waste Treatment Project Final Environmental Impact Statement and Record of Decision* (DOE/EIS-0290, January 1999). Although RCRA closure and D&D actions are generally summarized (see Section 3.1), it states “Once meaningful proposals concerning D&D activities are developed, DOE will undertake any additional *National Environmental Policy Act* (NEPA) analysis that may be required.”

**ENVIRONMENTAL CHECKLIST
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Based on the information provided in this Environmental Checklist, environmental impacts from performing the WMF-636 RCRA Closure described in Section B. are categorically excluded from further NEPA review. Specifically, Categorical Exclusion B6.1, Cleanup Actions. The proposed action is a small-scale, short-term cleanup action that will not cost more than \$10M and will reduce risk to human health and the environment.

The environmental impacts of transferring LLW from the INL Site to the Nevada National Security Site were analyzed in the 2014 Final Site-Wide Environmental Impact Statement for the Continued Operation of the Department of Energy/National Nuclear Security Administration Nevada National Security Site and Off-Site Locations in the State of Nevada (DOE/EIS-0426) and DOE's Waste Management Programmatic EIS (DOE/EIS-200). The fourth Record of Decision (ROD) (65 FR 10061, February 25, 2000) for DOE's Waste Management Programmatic EIS established the Nevada National Security Site as one of two regional LLW and MLLW disposal sites.